

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA

CRIMINAL DIVISION

UNITED STATES OF AMERICA,

CASE NO. 00-6040-CR-700

Plaintiff,

vs.

DERRICK ANDERSON,

Defendants.

FILED
MAR 20 AM 11:45
U.S. DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
FTL

DEFENDANT'S MOTION FOR EXTENSION OF TIME TO FILE MOTIONS

Defendant, **DERRICK ANDERSON**, by and through undersigned counsel, respectfully moves this Honorable Court for an extension of time to file motions, and in support thereof would show:

1. Counsel was retained approximately ten (10) days ago to represent the Defendant. Counsel met with the Defendant on March 3, 2000, and financial arrangements were made the following day to secure representation. The following day jail quarantine (chicken pox) prohibited counsel from further contact with the Defendant, which resulted in the cancellation of an investigative meeting regarding the facts of the case.

2. Counsel was provided with four (4) tapes at the time of the status conference. Unfortunately, all four (4) tapes were of the same conversation. The Government inadvertently gave the same tapes to each attorney, rather than four (4) separate tapes. The tapes have not yet been received. Transcripts have not yet been provided.

3. Counsel will be out of state between March 28, 2000, through April 3, 2000, for longstanding travel plans.

4. Attempts to contact Assistant U.S. Attorney Terrence Thompson have been made, but counsel has been unable to do so. Counsel does not anticipate any objection to the Defendant's request for an extension of time.

WHEREFORE, Defendant, DERRICK ANDERSON, respectfully moves this Honorable Court for an order extending time to file motions through and including April 10, 2000.

CERTIFICATE OF SERVICE

I **HEREBY CERTIFY** that a true and correct copy of the foregoing was mailed this 30th day of March, 2000, to the UNITED STATES ATTORNEY'S OFFICE, 299 East Broward Boulevard, Fort Lauderdale, Florida; and KENNETH P. HASSETT, ESQ., Hassett & Associates, P.A., Attorney for Defendant Dairiel Worrell, 201 Sevilla Avenue, Suite 202, Coral Gables, Florida 33134; ALVIN ENTIN, ESQ., Attorney for Richardo James, 200 East Broward Boulevard, Suite 1210, Fort Lauderdale, Florida 33301.

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